

PECHMAN LAW GROUP PLLC
ATTORNEYS AT LAW

488 MADISON AVENUE
NEW YORK, NEW YORK 10022
(212) 583-9500
WWW.PECHMANLAW.COM

June 10, 2022

VIA ECF

Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, New York 10007

Application GRANTED. The initial pretrial conference is adjourned to **September 28, 2022, at 4:00 p.m.** The Clerk of Court is directed to terminate ECF No. 13. SO ORDERED.



Re: *Ramirez-Gonzalez v. AZK Restaurant Inc. et al.*,
No. 22 Civ. 3091 (JMF)(JLC) (Request for Adjournment)

June 10, 2022

Dear Judge Furman:

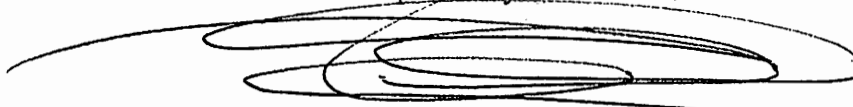
We represent the Defendants in the above-referenced action. Together with Plaintiff's counsel, Justin Cilenti of Cilenti & Cooper, PLLC, the Parties jointly submit this letter-motion to request an additional extension of time for Defendants to respond to the Complaint and adjournments of the settlement and initial pretrial conferences. This is the second time that the Parties make these requests.

Defendants request permission to file an Answer or otherwise respond to the Complaint by July 22, 2022. Defendants are meeting with the undersigned in the next two weeks to review all case facts and documents. As mentioned in our last correspondence (ECF No. 10), our firm recently lost two attorneys. Worse, our firm is also losing its most senior paralegal today, June 10, 2022.

The Parties wish to participate in court-annexed mediation by August 26, 2022. To preserve resources, and because the undersigned attorney will be out of the country in the first half of September 2022, the Parties jointly request that the initial pretrial conference be adjourned from August 5 to a date in the last week of September 2022.

We thank the Court for its time and attention to this matter and are available to discuss any further issues with the Court if necessary.

Respectfully submitted,



Gianfranco J. Cuadra

Encl.